

GIBSON DUNN

Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, DC 20036-5306
Tel 202.955.8500
www.gibsondunn.com

Matthew D. McGill
Direct: +1 202.887.3680
Fax: +1 202.530.9662
MMcGill@gibsondunn.com

March 8, 2021

Hon. Analisa Torres
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 15D
New York, NY 10007

Re: *Pharo Gaia Fund et al. v. The Bolivarian Republic of Venezuela*, No. 20-cv-8497

Dear Judge Torres:

Plaintiffs Pharo Gaia Fund, Ltd., Pharo Macro Fund, Ltd., and Pharo Trading Fund, Ltd. (collectively, the “Funds”) submit this letter in accordance with the Court’s Order of February 8, 2021, Dkt. 16, directing the Funds to submit a letter updating the Court on the status of service if service has not been completed by March 8, 2021.

As a reminder, on January 6, 2021, counsel for the Funds emailed the Department of State at the address designated for such inquiries, asking about the status of service. On January 14, 2021, the Department of State responded that it was “still in the process of serving the documents,” but that it “expect[ed] this will be accomplished soon,” and invited counsel to follow up on the week of January 25. On January 26, 2021, counsel for the Funds inquired again as to the status of service. The Department of State advised counsel that it “expect[ed] the documents will be transmitted next week,” and once the Department has “the certified copy complete, [the Department] will return the package to the court and provide a courtesy copy to [the Funds].” Counsel for the Funds received no indication of service during the week of February 1, 2021. On the morning of February 8, 2021, counsel for the Funds requested a status update from the Department. The Department responded that it had “not yet received confirmation of delivery,” but understood “it is in progress.”

On March 8, 2021, the Department advised in response to an inquiry from counsel for the Funds that “[t]he documents have been transmitted,” but that the Department is still “in the process of finalizing and returning to the clerk a certified copy of the diplomatic note of transmittal.”

Sincerely,

/s/ *Matthew D. McGill*

Matthew D. McGill